

I'm a veteran news broadcaster who started his career in local radionews in the 1970's. Today, I work in network television news part-time, and as a private media consultant full-time.

When I started out in local radio news, I entered a profession that had a clear sense of mission, in line with the FCC's mandate to serve the "public interest, convenience and necessity." There was strong and varied locally-produced content available throughout the country. Today, that is no longer the case, and a de-emphasis of localism is to blame. This changed emphasis, in my view, is not in service to viewers or listeners, but rather to an increasingly narrow group of station owners who see localism merely as a duplication of effort, and an obstacle to the economies of scale they envision for their "properties." The sense that the airwaves belong to the people, and not to the owners or their advertisers, is gone. So is the sense of broadcasting as a public trust.

Using market forces to define "local" programming, in an era in which the market is becoming concentrated in fewer and fewer hands, is risky business. Allowing the market to define local programming in such an environment can only result in decisions that benefit a small number of owners, not millions of viewers or listeners.

The FCC has failed to realize that according to the new economic model that its broadcasting policies have fostered, the audience is no longer the customer. The audience is the product. The real customer is now the advertiser, and the audience is sliced and diced into neat demographic groups for the advertiser's benefit. But this means that in practice, the airwaves no longer belong to the people - which is contrary to everything the FCC has stood for since 1934 and earlier.

The FCC needs to come up with a definition of local programming that rewards stations that actually produce programs in the communities in which they air, and which use staff that are physically present in those communities.

The criterion should be whether a broadcast is produced locally, at the local station, with little to no "network" provided content.

I'm skeptical of efforts to allow stations to count participation in local community activities to count as "local" programming. In my experience, these activities have tended to be commercial or self-promotional in nature, especially in recent years. Too many of these activities involve some kind of promo swap with car dealers, retailers, etc. Why should you get credit for serving your community when your real motive is to make money?

Thanks for taking the time to solicit the public's thoughts in this format. Too often, especially in the past decade, the FCC has appeared to be abandoning its mission to ensure that broadcasters operate in the "public interest, convenience and necessity." I hope this conversation signals the beginning of a reversal of that sad trend.